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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
	:	Chapter 15
In re:	:	
	:	Case No. 18-11094 (SCC)
PERFORADORA ORO NEGRO, S. DE R.L.	:	(Jointly Administered)
DE C.V., <i>et al.</i> ,	:	
	:	
Debtors in a Foreign Proceeding.	:	
	:	
-----X	:	
GONZALO GIL-WHITE, PERSONALLY	:	Adv. Pro. No. 19-01294
AND IN HIS CAPACITY AS FOREIGN	:	
REPRESENTATIVE OF PERFORADORA	:	
ORO NEGRO, S. DE R.L. DE C.V. AND	:	
INTEGRADORA DE SERVICIOS	:	
PETROLEROS ORO NEGRO, S.A.P.I. DE	:	
C.V.,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
ALP ERCIL, <i>et al.</i> ,	:	
	:	
Defendants.	:	
-----X	:	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that William J. O'Brien, an attorney with the law firm
of Skadden, Arps, Slate, Meagher & Flom LLP, and a member of the Bar of this Court hereby

enters his appearance in the above-captioned case (the “Adversary Proceeding”) as counsel for John Fredriksen, and requests, pursuant to Rules 2002, 9007, and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), that copies of all notices, documents, papers and pleadings in the Adversary Proceeding be given and served upon:

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PLEASE TAKE FURTHER NOTICE that pursuant to Bankruptcy Code section 1109(b), the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, any notice, application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, facsimile transmission, e-mail or otherwise filed or made with respect to the Adversary Proceeding.

PLEASE TAKE FURTHER NOTICE that neither this request for notice and service nor any later appearance, pleading, claim, or suit is a waiver of any substantive or procedural right. Nor shall this request be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules or Federal Rules of Civil Procedure.

Dated: March 6, 2020
New York, New York

/s/ William J. O'Brien
William J. O'Brien
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